

LOCKED

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF  
MASSACHUSETTS

CHAPTER 13 CASE  
NO. 02-12683-CJK

\*\*\*\*\*

In Re: \*  
\*  
EDNA L. ADAMS \*  
Debtor \*  
\*\*\*\*\*

**DEBTOR'S RESPONSE TO THE CHAPTER 13 TRUSTEE'S  
MOTION TO DISMISS**

In response to the Chapter 13 Trustee's Motion to Dismiss dated January 27, 2003 the debtor state as follows:

1. Admit.
2. Admit.
3. Admit.
4. The debtor acknowledges that the plan has expired. The debtor has obtained a commitment for a reverse mortgage.

Wherefore the debtor requests that:

1. She be allowed a reasonable period of time within which to "package" the refinancing of her home via the reverse mortgage; and
2. The Chapter 13 Trustee's Motion to Dismiss be denied.

24

617-742-2171

Respectfully submitted this 18th day of February, 2003.

Edna L. Adams  
By her attorney,

Richard Hackel

Richard S. Hackel, Esq.  
BBO# 215740  
98 North Washington Street  
Boston, MA 02114  
(617) 742-1899  
(617) 742-2171 (fax)  
[rhackel@aol.com](mailto:rhackel@aol.com) (e-mail)

### CERTIFICATE OF SERVICE

I, Richard S. Hackel, as counsel for the debtor, hereby certify that on February 18, 2003, I did send by first class mail, postage pre paid, or by fax, as indicated, a copy of the within Debtor's Response to the Trustee's Motion to Dismiss to the following parties:

Doreen B. Solomon, Esq.  
Chapter 13 Trustee  
PO Box 8250  
Boston, MA 02114-0033

Trustee  
fax to 617-523-4292

Edna L. Adams  
P.O.Box 748  
Dorchester, MA 02124-0012

Debtor

Signed under the pains and penalties of perjury this 18<sup>th</sup> day of February, 2003.

Richard Hackel  
Richard S. Hackel, Esq.